

**SEALED ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS <b>FILED</b>  SEP 11 2019  CLERK, U.S. DISTRICT COURT By _____ Deputy
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UNITED STATES OF AMERICA

v.

Case No.

**3-19CR-451-M**

**FILED UNDER SEAL**

CHANGCHENG LI (01)  
KAIFENG HU (02)  
STANISLAW KOBYLARCZYK (03)  
HENRYK WITMANSKI (04)  
MELANIA WITMANSKA (05)  
DARIUSZ NOSKIEWICZ (06)  
DANUTA NOSKIEWICZ (07)  
ADAM KOZAK (08)  
BOZENA STOJANOWSKA (09)  
SLAWOMIR PACKOWSKI (10)  
TERESA PARCZEWSKA (11)  
EWA PACKOWSKA (12)  
DANIAL GALA (13)  
ROKSANA POZNANSKA (14)  
ZBIGNIEW MAJEWSKI (15)  
KRYSTYNA WISNIEWSKA (16)  
ARTUR KWIATKOWSKI (17)  
KRYSTYNA HAUF (18)  
TROJAN KOWALSKI (19)  
ARTUR GILOWSKI (20)  
ROBERT KURPIEL (21)  
PIOTR GRESZTA (22)  
VITO CRUZ (23)  
SANTINO MARKOWSKI (24)  
SANDRO KOZLOWSKI (25)  
ZDZISLAW DOLINSKI (26)

**INDICTMENT**

The Grand Jury charges:

At all times material to this Indictment:

### Introduction

1. Starting at least as early as September 2014, and continuing until in or about September 2019, the exact dates being unknown to the Grand Jury, defendants **Changcheng Li (1), Kaifeng Hu (2), Stanislaw Kobylarczyk (3), Henryk Witmanski (4), Melania Witmanska (5), Dariusz Noskiewicz (6), Danuta Noskiewicz (7), Adam Kozak (8), Bozena Stojanowska (9), Slawomir Packowski (10), Teresa Parczewska (11), Ewa Packowska (12), Danial Gala (13), Roksana Poznandka (14), Zbigniew Majewski (15), Krystyna Wisniewska (16), Artur Kwiatkowski (17), Krystyna Hauf (18), Trojan Kowalski (19), Artur Gilowski (20), Robert Kurpiel (21), Piotr Greszta (22), Vito Cruz (23), Santino Markowski (24), Sandro Kozlowski (25), and Zdzislaw Dolinski (26)** engaged in an organized, retail-crime ring targeting merchants throughout the United States.

2. In furtherance of the conspiracy, some of the defendants traveled throughout the United States, often using vehicles registered to fictitious persons or nonexistent addresses, committing retail thefts of consumer goods at brick-and-mortar stores, such as Best Buy, Staples, OfficeMax, Office Depot, Walmart, and Lowe's Home Improvement. The defendants used various means to avoid detection, including "booster skirts" and electronic transmitters designed to disrupt retailers' anti-theft and loss-prevention measures.

3. Once stolen, the goods were packaged and shipped to storage lockers located in the Chicago area, where some of the defendants sold the stolen goods or shipped them to "fences" in Coppel, Texas, who then sold the stolen goods using online

storefronts on eBay and Amazon, where the stolen goods were then purchased and shipped to individuals throughout the United States, including to individuals located in the Northern District of Texas.

The Defendants

4. Defendant **Changcheng Li (1)** was located in Coppell, Texas, where he and his wife, defendant **Kaifeng Hu (2)**, operated Li Amspirit, Amspirit LLC, and Office Supplies, Inc. which were businesses that operated online storefronts on the eBay and Amazon platforms.

5. Defendants **Stanislaw Kobylarczyk (3)** and **Artur Gilowski (20)** operated retail stores in the Chicago area that were fronts for the sale of stolen goods obtained from other coconspirators. **Kobylarczyk (3)** and **Gilowski (20)** also operated online storefronts on the eBay and Amazon platforms that sold stolen goods over the internet and controlled bank accounts, including PayPal accounts, that were used to receive payments for the stolen goods and transfer illegal proceeds between and among the coconspirators.

6. Defendants **Robert Kurpiel (21)** and **Piotr Greszta (22)** worked at the retail stores operated by **Artur Gilowski (20)** and controlled bank accounts, including PayPal accounts, that were used to receive payments for the stolen goods and transfer illegal proceeds between and among the coconspirators.

7. Defendants **Adam Kozak (8)**, **Slawomir Packowski (10)**, **Daniel Gala (13)**, **Roksana Poznanska (14)**, **Sandro Kozlowski (25)**, and **Zdzislaw Dolinski (26)** established storage lockers using alias names at mail facilities in the Chicago area to

receive packages containing stolen goods from throughout the United States.

8. Defendants **Henryk Witmanski (4), Melania Witmanska (5), Dariusz Noskiewicz (6), Danuta Noskiewicz (7), Adam Kozak (8), Bozena Stojanowska (9), Slawomir Packowski (10), Teresa Parczewska (11), Ewa Packowska (12), Daniel Gala (13), Roksana Poznanska (14), Zbigniew Majewski (15), Krystyna Wisniewska (16), Artur Kwiatkowski (17), Krystyna Hauf (18), Trojan Kowalski (19), Vito Cruz (23), Santino Markowski (24), Sandro Kozlowski (25), and Zdzislaw Dolinski (26)** traveled the United States, stealing retail consumer products from brick-and-mortar stores and shipping the stolen goods to storage facilities in the Chicago area.

----- NOTHING FURTHER ON THIS PAGE -----

Count One

Conspiracy to Commit Interstate Transportation of Stolen Property  
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 2314))

9. The grand jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 8 of this Indictment as if fully set forth herein.

10. Beginning at least as early as September 2014 and continuing until in or about September 2019, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, defendants **Changcheng Li (1), Kaifeng Hu (2), Stanislaw Kobylarczyk (3), Henryk Witmanski (4), Melania Witmanska (5), Dariusz Noskiewicz (6), Danuta Noskiewicz (7), Adam Kozak (8), Bozena Stojanowska (9), Slawomir Packowski (10), Teresa Parczewska (11), Ewa Packowska (12), Danial Gala (13), Roksana Poznandka (14), Zbigniew Majewski (15), Krystyna Wisniewska (16), Artur Kwiatkowski (17), Krystyna Hauf (18), Trojan Kowalski (19), Artur Gilowski (20), Robert Kurpiel (21), Piotr Greszta (22), Vito Cruz (23), Santino Markowski (24), Sandro Kozlowski (25), and Zdzislaw Dolinski (26)** did knowingly, intentionally, and unlawfully combine, conspire, consider, and agree with other persons, both known and unknown to the Grand Jury, to unlawfully transport, transmit, and transfer in interstate and foreign commerce from various locations around the United States, to Coppell, Texas, stolen goods, wares, and merchandise, that is, retail consumer products, having an aggregate value of \$5,000 or more, knowing the same to have been stolen converted, and taken by fraud, in violation of 18 U.S.C. § 2314.

Object of the Conspiracy

11. The object of the conspiracy was that the defendants, **Changcheng Li (1)**, **Kaifeng Hu (2)**, **Stanislaw Kobylarczyk (3)**, **Henryk Witmanski (4)**, **Melania Witmanska (5)**, **Dariusz Noskiewicz (6)**, **Danuta Noskiewicz (7)**, **Adam Kozak (8)**, **Bozena Stojanowska (9)**, **Slawomir Packowski (10)**, **Teresa Parczewska (11)**, **Ewa Packowska (12)**, **Danial Gala (13)**, **Roksana Poznandka (14)**, **Zbigniew Majewski (15)**, **Krystyna Wisniewska (16)**, **Artur Kwiatkowski (17)**, **Krystyna Hauf (18)**, **Trojan Kowalski (19)**, **Artur Gilowski (20)**, **Robert Kurpiel (21)**, **Piotr Greszta (22)**, **Vito Cruz (23)**, **Santino Markowski (24)**, **Sandro Kozlowski (25)**, and **Zdzislaw Dolinski (26)**, unlawfully enriched themselves by organizing, coordinating, and executing the nationwide theft of retail products from brick-and-mortar stores around the United States, the shipment of those stolen goods to storage lockers and other postal repositories in the Chicago area, and then reshipment of those stolen goods to a “fence” in Coppell, Texas, who sold the stolen goods over the internet using online platforms, such as eBay and Amazon.

Manner and Means of the Conspiracy

12. It was part of the conspiracy that the coconspirators established storage lockers at storage facilities and private mailboxes at Commercial Mail Receiving Agencies to receive stolen goods from throughout the United States.

13. It was part of the conspiracy that one or more of the coconspirators established online store fronts through internet sites using online platforms, such as eBay and Amazon, to distribute stolen goods throughout the United States.

14. It was part of the conspiracy that one or more coconspirators established online payment mechanisms, such as PayPal, to receive funds from consumers purchasing stolen goods. It was further part of the conspiracy that one or more coconspirators linked bank accounts between and among the coconspirators to each other's PayPal accounts in order to control the receipt of proceeds of the theft.

15. It was part of the conspiracy that the coconspirators used alias names or the names of fictitious persons in connection with storage lockers at storage facilities or registration of vehicles in order to disguise and conceal the conspirators' involvement.

16. It was part of the conspiracy that the coconspirators used anti-theft mechanisms, such as "booster skirts," which are skirts specially designed to provide concealment pouches for stolen goods, in an effort to avoid getting caught when committing retail theft at brick-and-mortar stores.

17. It was part of the conspiracy that the one or more coconspirators transferred to funds to other participants in the conspiracy and to accounts located overseas in various places, including Poland.

#### Overt Acts

18. In furtherance of the conspiracy, and to accomplish its objects and purposes, the defendants committed and caused to be committed, in the Northern District of Texas and elsewhere, the following overt acts:

a. On or about April 23, 2015, **Stanislaw Kobylarczyk (3)** opened Account No. x1371 at the Polish and Slavic Federal Credit Union, which was used to facilitate monetary transfers in furtherance of the scheme.

b. On or about August 18, 2015, **Zdzislaw Dolinski (26)** rented a storage locker at Extra Space Storage in Chicago, Illinois, to receive packages containing stolen goods.

c. On or about August 18, 2015, **Roksana Poznanska (14)** opened Account No. x0764 at the Polish and Slavic Federal Credit Union, which was used to facilitate monetary transfers in furtherance of the scheme.

d. On or about January 21, 2016, **Piotr Greszta (22)** registered an Amazon seller profile under the business name Extreme Network.

e. On or about February 2, 2016, **Stanislaw Kobylarczyk (3)** registered the corporation “The Best Deals” with the Illinois Secretary of State’s Office, listing himself as the primary agent for the corporation.

f. On or about February 13, 2016, **Stanislaw Kobylarczyk (3)** opened Account No. x4540 at the Polish and Slavic Federal Credit Union in the name of Best Deals, Inc., which was used to facilitate monetary transfers in furtherance of the scheme.

g. On or about March 18, 2016, **Adam Kozak (8)** opened Account No. x7477 at the Polish and Slavic Federal Credit Union, which was used to facilitate monetary transfers in furtherance of the scheme.

h. Between on or about March 29, 2016, and on or about August 28, 2017, **Adam Kozak (8)** received approximately 71 checks from Account No. x4540, controlled by **Stanislaw Kobylarczyk (3)**, which were deposited into Account No. x7477.

i. On or about April 12, 2016, **Changcheng Li (1)** created false invoices to make it appear he had legitimately acquired products sold via the Amazon storefront and



supplied the false invoices to Amazon.

j. On or about April 26, 2016, **Robert Kurpiel (21)** established a PayPal account that is connected to bank accounts controlled in part by **Artur Gilowski (20)**.

k. On or about February 2, 2017, **Adam Kozak (8)**, using the alias “Jan Koptko,” opened a storage locker at Extra Space Storage in Chicago, Illinois, that was used to receive stolen goods.

l. On or about July 5, 2017, **Slawomir Packowski (10)**, using the alias name “Adam Kon,” opened a storage locker at Extra Space Storage that was used to receive packages containing stolen goods.

m. On or about August 20, 2017, **Henryk Witmanski (4)** and **Melania Witmanska (5)** committed retail theft from a Walmart in Pocahontas, Arkansas, utilizing a gray Lexus SUV registered to a fictitious person.

n. On or about September 20, 2017, **Stanislaw Kobylarczyk (3)** shipped packages from Skokie, Illinois, to **Changcheng Li (1)** and **Kaifeng Hu (2)** in Coppell, Texas, via Federal Express.

o. On or about October 24, 2017, **Stanislaw Kobylarczyk (3)** and **Henryk Witmanski (4)** shipped boxes to a private mailbox established by **Changcheng Li (1)** via Federal Express, which were received by **Changcheng Li (1)** and **Kaifeng Hu (2)** on or about October 26, 2017, from their private mailbox at PostNet in Coppell, Texas.

p. On or about October 26, 2017, **Danuta Noskiewicz (7)** committed retail theft from a Walmart in Illinois.

q. On or about November 6, 2017, **Roksana Poznanska (14)**, using the alias

name “Anna Tosi,” opened a storage locker at Extra Space Storage in Chicago, Illinois.

r. On or about December 3, 2017, **Adam Kozak (8)** and **Bozena Stojanowska (9)** shipped a package containing stolen goods from North Carolina to Extra Space Storage in Chicago, Illinois.

s. On or about December 30, 2017, **Melania Witmanska (5)** opened Account No. x8301 at U.S. Bank, which was used to facilitate monetary transfers in furtherance of the scheme.

t. Between on or about February 3, 2018, and on or about February 11, 2018, **Daniel Gala (13)** shipped packages from FedEx stores in New York, Massachusetts, Connecticut, Pennsylvania, Virginia, and Georgia to storage lockers at Extra Space Storage in Chicago, Illinois.

u. On or about February 8, 2018, **Henryk Witmanski (4)** shipped packages containing stolen goods from Bloomington, California, to the “Anna Tosi” storage locker, controlled by **Roksana Poznanska (14)**, at Extra Space Storage in Chicago, Illinois.

v. On or about February 14, 2018, **Roksana Poznanska (14)** received four packages containing stolen goods from California, Florida, and Georgia at her storage locker in the name of “Anna Tosi” at Extra Space Storage in Chicago, Illinois.

w. On or about February 27, 2018, **Daniel Gala (13)** and **Bozena Stojanowska (9)** traveled in a grey Honda van registered to “Anna Tosi,” an alias name used by **Roksana Poznanska (14)**, to Best Buy in Gurnee, Illinois, where they stole retail items.

x. On or about March 29, 2018, **Slawomir Packowski (10)** and **Ewa**

**Packowska (12)**, traveling in a silver Chrysler van, committed retail theft at a Trek store in Illinois.

y. On or about April 4, 2018, **Sandro Kozlowski (25)** committed retail thefts from one or more Walmart stores in Illinois.

z. On or about April 10, 2018, **Daniel Gala (13)** and **Roksana Poznanska (14)** committed retail theft from a Walmart store in Florida using a blue Toyota minivan registered to a fictitious person.

aa. On or about April 11, 2018, **Daniel Gala (13)** presented identification under the name “Jan Koptko,” a false name that **Adam Kozak (8)** had used to open a storage locker at Extra Space Storage in February 2018.

bb. Between April 14, 2018 and April 17, 2018, **Sandro Kozlowski (25)** and **Zdzislaw Dolinski (26)** shipped packages containing stolen goods from locations in Texas, Virginia, and Michigan to a storage locker at Extra Space Storage controlled by **Artur Gilowski (20)**.

cc. On or about April 28, 2018, **Zbigniew Majewski (15)** and **Krystyna Wisniewska (16)**, driving a silver Chrysler van previously used by **Slawomir Packowski (10)**, committed retail theft from one or more Best Buy stores in Illinois, Iowa, and Nebraska.

dd. On or about May 6, 2018, **Darius Noskiewicz (6)** and **Danuta Noskiewicz (7)** committed retail theft from a T.J. Maxx in Illinois.

ee. Between on or about May 12, 2018, and on or about June 13, 2018, **Zbigniew Majewski (15)** and **Krystyna Wisniewska (16)** shipped packages containing

stolen goods from FedEx stores in Texas, Georgia, Florida, Iowa, Nebraska, and Missouri to the “Kon” storage locker, controlled by **Slawomir Packowski (10)**, at Extra Space Storage in Chicago, Illinois.

ff. Between on or about May 12, 2018, and on or about May 14, 2018, **Slawomir Packowski (10)** shipped packages from several FedEx stores in Texas to storage units at Extra Space Storage in Chicago, Illinois.

gg. On or about May 14, 2018, **Zbigniew Majewski (15)** shipped packages containing stolen goods from a FedEx store in Conroe, Texas, to the “Adam Kon” storage locker, controlled by **Slawomir Packowski (10)**, at Extra Space Storage in Chicago, Illinois.

hh. On or about May 30, 2018, **Adam Kozak (8)** shipped a package containing stolen goods from a FedEx store in Conroe, Texas, to Extra Space Storage in Chicago, Illinois.

ii. On or about June 25, 2018, **Changcheng Li (1)** and **Kaifeng Hu (2)** established a private mailbox at a UPS store in Coppell, Texas, in the name of Amspirit, LLC.

jj. On or about July 5, 2018, **Dariusz Noskiewicz (6)** and **Danuta Noskiewicz (7)**, using a light green Toyota Sienna minivan registered to “Han Zyga,” a fictitious person, committed retail theft from a Lowe’s Home Improvement store in North Carolina.

kk. On or about July 27, 2018, **Artur Kwiatkowski (17)**, **Krystyna Hauf (18)**, and **Trojan Kowalski (19)**, traveling in a light green Toyota Sienna minivan registered to

a fictitious name, committed retail theft at Walmart stores in Illinois and Wisconsin.

ll. On or about August 1, 2018, **Artur Kwiatkowski (17)**, **Krystyna Hauf (18)**, and **Trojan Kowalski (19)**, traveling in a light green Toyota Sienna minivan registered to a fictitious name, were stopped by officers in a vehicle with graphing calculators and a black custom sewn skirt commonly referred to as a “booster skirt.”

mm. On or about August 2, 2018, **Zdzislaw Dolinski (26)** committed retail theft at a Lowe’s Home Improvement store in Arlington Heights, Illinois.

nn. Between August 23, 2018, and September 25, 2018, **Slawomir Packowski (10)**, **Teresa Parczewska (11)**, and **Ewa Packowska (12)** traveled to various retail stores located across the United States, including to locations in the Northern District of Texas, in a silver Buick Enclave registered to a fictitious person.

oo. On or about August 24, 2018, **Slawomir Packowski (10)** and **Teresa Parczewska (11)** committed retail theft from an Office Depot in Olathe, Kansas.

pp. On or about August 25, 2018, **Slawomir Packowski (10)** and **Teresa Parczewska (11)** committed retail theft from an Office Depot in Colorado.

qq. On or about September 25, 2018, **Slawomir Packowski (10)**, **Teresa Parczewska (11)**, and **Ewa Packowska (12)** committed retail theft at a Lowe’s Home Improvement store in Fenton, Missouri, following shipment of packages containing stolen goods to a storage locker in the name of “Adam Kon” at Extra Space Storage in Chicago, Illinois.

rr. On or about November 7, 2018, **Stanislaw Kobylarczyk (3)** shipped ten boxes from Chicago, Illinois, to **Changcheng Li (1)** and **Kaifeng Hu (2)** in Coppell,

Texas, via Federal Express.

ss. On or about November 9, 2018, **Vito Cruz (23)** and **Santino Markowski (24)**, utilizing a vehicle registered to a fictitious person, attempted to commit a retail theft at a Menard's store in Schererville, Indiana.

tt. On or about June 21, 2019, **Zdzislaw Dolinski (26)**, traveling in a beige Sienna minivan registered to a fictitious name, committed a retail theft at a Best Buy store in Brentwood, Tennessee.

uu. The coconspirators also committed the overt acts set forth in Count Two, which is incorporated by reference as if set forth fully in this Count.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 2314).

Count Two

Interstate Transportation of Stolen Property and Aiding and Abetting  
(Violation of 18 U.S.C. §§ 2314 and 2)

19. The grand jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 18 of this Indictment as if fully set forth herein.

20. On or about November 9, 2018, in the Northern District of Texas and elsewhere, the defendants, **Changcheng Li (1)**, **Kaifeng Hu (2)**, and **Stanislaw Kobylarczyk (3)**, aided and abetted by each other, did unlawfully transport, transmit, and transfer in interstate commerce from Chicago, Illinois, to Coppell, Texas, stolen goods, wares, and merchandise, that is, retail consumer products, having an aggregate value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of 18 U.S.C. §§ 2314 and 2.

Notice of Forfeiture  
(18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c))

Upon conviction of the charged offenses, defendants **Changcheng Li (1), Kaifeng Hu (2), Stanislaw Kobylarczyk (3), Henryk Witmanski (4), Melania Witmanska (5), Dariusz Noskiewicz (6), Danuta Noskiewicz (7), Adam Kozak (8), Bozena Stojanowska (9), Slawomir Packowski (10), Teresa Parczewska (11), Ewa Packowska (12), Danial Gala (13), Roksana Poznandka (14), Zbigniew Majewski (15), Krystyna Wisniewska (16), Artur Kwiatkowski (17), Krystyna Hauf (18), Trojan Kowalski (19), Artur Gilowski (20), Robert Kurpiel (21), Piotr Greszta (22), Vito Cruz (23), Santino Markowski (24), Sandro Kozlowski (25), and Zdzislaw Dolinski (26)** shall forfeit to the United States any property, real or personal, which constitutes or is derived from, whether directly or indirectly, proceeds traceable to the respective offense.

This property includes, but is not limited to, the following:

1. The total proceeds derived from the offense, commonly referred to as a “money judgment.”
2. Real property located at
  - (a) 340 Waterview Drive, Coppell, Texas 75019;
  - (b) 79 W. Wildwood Drive, Barrington, Illinois 60010;
  - (c) 157 G. Helm Road, Barrington, Illinois 60010; and
  - (d) 136 N. Norman Drive, Palatine, Illinois 60074

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of




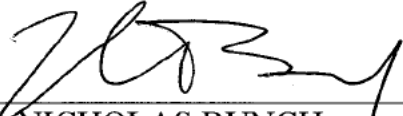
the above property subject to forfeiture, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the above described property subject to forfeiture.

A TRUE BILL

FOREPERSON

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UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

CHANGCHENG LI (01)  
KAIFENG HU (02)  
STANISLAW KOBYLARCZYK (03)  
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SANDRO KOZLOWSKI (25)  
ZDZISLAW DOLINSKI (26)

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INDICTMENT

18 U.S.C. § 371 (18 U.S.C. §2314)

Conspiracy to Commit Interstate Transportation of Stolen Property  
(Count 1)

18 U.S.C. § 2314 and 2

Interstate Transportation of Stolen Property and Aiding and Abetting  
(Count 2)

18 U.S.C. § 981 (a)(1)(c) and 28 U.S.C. §2461 (c)  
Forfeiture Notice

2 Counts


A true bill rendered

DALLAS

FOREPERSON

Filed in open court this 11 day of September, 2019.

Warrant to be Issued for all Defendants

  
UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending